Engineering and Compliance

Page 1

Appl. no. Below

Processed by Todd Iwata

Checked by Date 1.16.09

APPLICATION PROCESSING AND CALCULATION

Western Tube & Conduit 2001 E. Dominguez St. Carson. CA 90810

ID#: 22092

EQUIPMENT DESCRIPTION

A/N 487220: Title V Permit Revision

A/N 470481 (Current a/n 441232, p/n F76569) GALVANIZING LINE NO. 4 CONSISTING OF:

- 1. CLEANING TANK.
- 2.1. FORMING MILL.
- 3.2. SEAM WELDER, 300 KW.
- 4.3. BUFFING WHEEL.
- <u>5.4.</u> PICKLING TANK.
- <u>6.5.</u> CONDUIT PREHEATER, ELECTRICALLY HEATED.
- 7.6. FURNACE, ZINC GALVANIZING, LINDBURG, HEVI-DUTY, KETTLE-TYPE, 3'-6" W. X 20'-0" L. X 6'-3" H., 4,550,000 BTU PER HOUR, NATURAL GAS-FIRED, WITH A 7 ½ HP BLOWER.
- 8.7. COOLING TANK.
- 9.8. SIZING MILL.
- 10.9. CHROMATE COATER.
- 11.10. UV COATER.
- 12.10. LACQUER COATER.
- 13.11. UV CURE STATION, ELECTRICALLY HEATED.
- 14.12. CONDUIT CUT OFF.

A/N 470492 (Current a/n 369711, p/n F49592) AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

- 1. BAGHOUSE, SULZER METCO, MODEL NO. <u>SME12-35</u>, <u>SME27-35A</u>, WITH <u>TWELVE</u> <u>TWENTY-SEVEN</u> 14" DIA. X 26" L. CARTRIDGE FILTERS.
- 2. EXHAUST SYSTEM CONSISTING OF ONE <u>15</u> 10 H.P. EXHAUST BLOWER VENTING ONE ZINC GALVANIZING FURNACE AND A DROSSING AREA.

Engineering and Compliance

APPLICATION PROCESSING AND CALCULATION

Page 2

Appl. no. Below

Processed by Todd Iwata

Checked by Date 1.16.09

A/N 474334 (Current a/n 441233, p/n F76570)

A/N 4/4334 (Current a/n 441233, p/n F/65/0) GALVANIZING LINE NO. 6 CONSISTING OF:

- STRIP ACCUMULATOR AND CLEANING TANK.
- 2. FORMING MILL.
- 3. SEAM WELDER, 400 KW.
- 4. SQUARING STAND.
- 5. PICKLING TANK, 4'-0" W. X 8'-0" L. X 3'-0" D., UNHEATED.
- 6. INDUCTION COIL STATION.
- 7. CONDUIT PREHEATER, ELECTRICALLY HEATED.
- 8. FURNACE, ZINC GALVANIZING, AJAX MAGNETHERMIC, MODEL NO. EHG2, 120 KW ELECTRICALLY HEATED WITH A DROSSING AREA.
- 9. COOLING TANK.
- 10. SIZING MILL.
- 11. CHROMATE COATER.
- 12. LACQUER COATER.
- 13. CONDUIT CUT OFF.
- 14. END BRUSHING MACHINE.

A/N 474335 (Current a/n 441235, p/n F76571) GALVANIZING LINE NO. 2 CONSISTING OF:

- 1. LOOPER BOX AND CLEANING TANK.
- 2. FORMING MILL.
- 3. SEAM WELDER, 300 KW.
- 4. CONDUIT COOLING TANK.
- 5. BUFFING WHEEL.
- 6 PICKLING TANK.
- 7. CONDUIT PREHEATER, ELECTRICALLY HEATED.
- 8. FURNACE, ZINC GALVANIZING, LINDBURG, HEVI-DUTY, KETTLE-TYPE, 3'-0" W. X 14'-0" L. X 3'-5" H., 1,600,000 BTU PER HOUR, NATURAL GAS-FIRED, WITH A 5 HP BLOWER.

Engineering and Compliance

Page 3

Appl. no. Below

Processed by Todd Iwata

Checked by Date 1.16.09

APPLICATION PROCESSING AND CALCULATION

- 9. COOLING TANK.
- 10. SIZING MILL.
- 11. CHROMATE COATER.
- 12. LACQUER COATER.
- 13. CONDUIT CUT OFF.
- 14. END BRUSHING MACHINE.

BACKGROUND

Western Tube & Conduit submitted application nos. 470481, 470492, 474334, 474335 and 487220 for the following reasons.

<u>A/N 470481</u>: This application was submitted to add an existing cleaning tank to the permit wording for galvanizing line no. 4. The tank has always been a part of the line. The cleaning tank will be item no. 1 in the equipment description. The material used in the cleaning tank EBC-1 is an emulsifier that does not contain VOC or Rule 1401 toxic air contaminants (MSDS in application folder). Galvanizing line nos. 2 and 6 also have cleaning tanks and are listed in their permit descriptions. In order to ensure that there is no emission increase from this permit unit, a permit condition will be added to this permit unit indicating that the cleaning material used in the tank shall not contain VOC or any toxic air contaminants identified in Rule 1401. Also with this application, the UV/lacquer coaters (item no. 10 of the permit wording) will be separated into two individual items, nos. 10 and 11. They are two different coaters and should be listed individually.

<u>A/N 470492</u>: This application was submitted for the replacement of the baghouse permitted under F49592. The baghouse under F49592 was issued a permit to construct on 11/2/2000 and a permit to operate on 3/5/2002. It is not clear if the applicant installed a different baghouse or replaced the baghouse during the past five years. The baghouse is used to control emissions from the zinc galvanizing furnace and drossing area of galvanizing line no. 6. The new baghouse contains twelve 14" dia. x 26" long cartridge filters, each with a surface area of 250 ft². The older baghouse contained twenty seven cartridge filters, each with a surface area of 250 ft². The total surface area of the filters for the new baghouse is 3,000 ft² and the flow rate of the 15 hp exhaust blower is 2,500 ft³/min. The air-to-cloth ratio of the new baghouse is 0.83 ft/min which is acceptable for metallurgical fumes.

<u>A/N 474334 & 474335</u>: This application was submitted to update conditions that are shared with galvanizing line no. 4 (A/N 470481) using the new application number of line no. 4. The following conditions will as adjusted as follows:

Engineering and Compliance

Appl. no. Below

Processed by Todd Iwata

Checked by **Date** 1.16.09

APPLICATION PROCESSING AND CALCULATION

A/N 474335:

- THE TOTAL QUANTITY OF NATURAL GAS USED IN THIS EQUIPMENT AND THE EQUIPMENT OPERATING UNDER APPLICATION NUMBER 441232 470481 SHALL NOT CUMULATIVELY EXCEED 3,600,000 CUBIC FEET IN ANY ONE MONTH.
- 5. THE OPERATOR SHALL INSTALL AND MAINTAIN A NON-RESETTABLE TOTALIZING FUEL METER TO ACCURATELY INDICATE THE AMOUNT OF FUEL BEING SUPPLIED TO THE EQUIPMENT OPERATING UNDER APPLICATION NUMBERS 441232 470481 AND 474335.
- THE TOTAL AMOUNT OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS FROM THE 6. USE OF MATERIALS APPLIED IN THE CHROMATE, UV AND LACQUER COATERS PERMITTED UNDER APPLICATION NUMBERS 441232 470481, 474334 AND 474335 SHALL NOT EXCEED 30 POUNDS IN ANY ONE DAY.

A/N 474334:

THE TOTAL AMOUNT OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS FROM THE USE OF MATERIALS APPLIED IN THE CHROMATE, UV AND LACQUER COATERS PERMITTED UNDER APPLICATION NUMBERS 441232 470481, 474334 AND 474335 SHALL NOT EXCEED 30 POUNDS IN ANY ONE DAY.

Western Tube & Conduit is a Title V facility. A Title V renewal permit was issued to this facility on October 1, 2006. Western Tube & Conduit has proposed to revise their Title V renewal permit with application no. 487220 by making the above described modifications to their facility permit. This permit revision is considered as a "minor permit revision" to the renewal Title V permit, as described in the Regulation XXX evaluation.

PROCESS DESCRIPTION

Western Tube & Conduit manufactures metal tubes and conduits. The end product is varied, chain-linked fence poles, electric wire conduits, etc. The metal tube or pipe is manufactured in a continuous process in which pipe is formed from steel strips. The formed pipe is welded, cleaned, fluxed, galvanized, and cut in desired lengths. After the tubes and conduits are cut to size, some are painted with a touch-up coating in the spray booths. After the coating, the tubes and conduits are packaged and prepared for shipping. Western Tube & Conduit operates under an existing 1,417 lbs/day facility VOC emission limit and under the requirements of Rules 1107 and 1171. They operate up to 24 hrs/day, 365 days/yr.

EMISSION ESTIMATES

Since the equipment will be operated as previously permitted, there will not be an increase in Emission estimates for the proposed project will be the same emissions as determined with the previous applications.

A/N 470481:

Operating schedule: 24 hr/day, 5 day/wk, 50 wk/yr

Hourly CO emissions = 0.07 lb/hr

Engineering and Compliance

Page 5

Appl. no. Below

Processed by Todd Iwata

Checked by Date 1.16.09

APPLICATION PROCESSING AND CALCULATION

Hourly NOx emissions = 0.48 lb/hr

Hourly PM10 emissions = 0.01 lb/hr from combustion + 0.068 lb/hr from galvanizing

= 0.078 lb/hr

Hourly ROG emissions = 1.04 lb/hr

A/N 470492:

The emissions to the baghouse are accounted for under the basic equipment.

Operating schedule: 24 hr/day, 5 day/wk, 50 wk/yr

Uncontrolled hourly PM10 emissions to the baghouse = 0.42 lb/hr

Controlled hourly PM10 emissions = 0.004 lb/hr

A/N 474334:

Operating schedule: 24 hr/day, 5 day/wk, 50 wk/yr

Hourly ROG emissions = 0.01 lb/hr

Uncontrolled hourly PM10 emissions = 0.45 lb/hr

Controlled hourly PM10 emissions = 0.0056

A/N 474335:

Operating schedule: 24 hr/day, 5 day/wk, 50 wk/yr

Hourly CO emissions = 0.02 lb/hr Hourly NOx emissions = 0.2 lb/hr Hourly ROG emissions = 0.01 lb/hr

Hourly PM10 emissions = 0.068 lb/hr from galvanizing

RULE ANALYSIS

RULE 212 (c)(1): This section requires a public notice for all new or modified permit units that emit air contaminants located within 1,000 feet from the outer boundary of a school. The facility is not located within 1,000 feet of the outer boundary of a school.

RULES 212 (c)(2) & 212(g): These sections requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g). There will not be an emission increase with the proposed project.

	Maximum Daily Emissions					
	ROG	NO _x	PM ₁₀	SO ₂	CO	Pb
Emission increase	0	0	0	0	0	0
MAX Limit (lb/day)	30	40	30	60	220	3
Compliance Status	Yes	Yes	Yes	Yes	Yes	Yes

Engineering and Compliance

Page 6

Appl. no. Below

Processed by Todd Iwata

Checked by Date 1.16.09

APPLICATION PROCESSING AND CALCULATION

RULE 212(c)(3): This section requires a public notice for all new or modified permit units with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in a cancer risk equal or greater than one in a million. There will not be a cancer risk equal or greater than one in a million.

RULES 401 & 402: AQMD database has no records of any visible emissions or nuisance complaints against this facility. Compliance with these requirements is expected with the proper operation of the equipment.

RULE 404 (baghouse): Continued compliance of the new unit with the PM concentration limit of this rule is expected as shown below:

Total PM emissions = 0.04 lb/hr

Total exhaust gas flow rate after the modification = $2,500 \text{ ft}^3/\text{min}$

 $gr PM/ft^3 = (0.04 lb/hr)(7,000 gr/lb)(hr/60 min)(min/2,500 ft^3) = 0.0019 gr PM/ft^3$

From Table 404(a) of Rule 404, the interpolated particulates emission concentration limit at 2,500 ft³/min is equal to 0.134 gr/ft³. Therefore, the expected PM emission concentration of 0.0019 gr/ft³ is within this max limit.

Rag XI: Western Tube & Conduit will continue to operate the equipment in compliance with the applicable rules of this regulation since the there will be no operational changes.

Rag XIII: There will not be an emission increase with this project. The equipment will be operated as previously permitted, in compliance with the requirements of this regulation.

RULE 1401: There will not be an increase in Toxic Air Contaminants, further analysis is not required.

REGULATION XXX

This facility is not in the RECLAIM program. The proposed project is considered as a "minor permit revision" to the Title V permit for this facility.

Rule 3000(b)(12)(vi) defines a "minor permit revision" as any Title V permit revision that does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

The proposed project is not expected to result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a "minor permit revision" pursuant to Rule 3000(b)(12)(A)(vi).

Engineering and Compliance

Page 7

Appl. no. Below

Processed by Todd Iwata

Checked by Date 1.16.09

APPLICATION PROCESSING AND CALCULATION

This proposed project is the 2nd permit revision to the Title V renewal permit issued to this facility on October 1, 2006. The following table summarizes the permit revisions since the Title V renewal permit was issued:

Revision	HAP	VOC	NOx	PM ₁₀	SOx	CO
1 st Permit Revision;	0	0	0	0	0	0
2 nd Permit Revision;	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily	30	30	40	30	60	220

RECOMMENDATION

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a "minor permit revision", it is exempt from the public participation requirements under Rule 3006 (b). A proposed permit incorporating this permit revision will be submitted to the EPA for a 45-day review pursuant to Rule 3003(j). If the EPA does not raise any objections within the review period, a revised Title V permit will be issued to this facility.

CONDITIONS

A/N 470481:

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

 [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
 [RULE 204]
- 3. THE PICKLING TANK, FURNACE AND DROSS AREA SHALL NOT BE OPERATED UNLESS IT IS VENTED ONLY TO AIR POLLUTION CONTROL EQUIPMENT WHICH IS IN FULL USE AND WHICH HAS BEEN ISSUED AN OPERATING PERMIT BY THE EXECUTIVE OFFICER.

 [RULE 1303(a)(1)-BACT]
- 4. THE TOTAL QUANTITY OF NATURAL GAS USED IN THIS EQUIPMENT AND THE EQUIPMENT OPERATING UNDER APPLICATION NUMBER 474335 SHALL NOT CUMULATIVELY EXCEED 3,600,000 CUBIC FEET IN ANY ONE MONTH. [RULE 1303(b)(2)-OFFSET]
- 5. THE OPERATOR SHALL INSTALL AND MAINTAIN A NON-RESETTABLE TOTALIZING FUEL METER TO ACCURATELY INDICATE THE AMOUNT OF FUEL BEING SUPPLIED TO THE EQUIPMENT OPERATING UNDER APPLICATION NUMBERS 470481 AND 474335.

 [RULE 1303(b)(2)-OFFSET]

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT Page 8 Appl. no. Below Processed by Todd Iwata Checked by APPLICATION PROCESSING AND CALCULATION Page 8 Appl. no. Below Processed by Todd Iwata Checked by Date 1.16.09

- 6. THE TOTAL AMOUNT OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS FROM THE USE OF MATERIALS APPLIED IN THE CHROMATE, UV AND LACQUER COATERS PERMITTED UNDER APPLICATION NUMBERS 470481, 474334 AND 474335 SHALL NOT EXCEED 30 POUNDS IN ANY ONE DAY.

 [RULE 1303(b)(2)-OFFSET]
- 7. IN ADDITION TO THE RECORDKEEPING REQUIREMENTS OF RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY DAILY VOC EMISSIONS, IN POUNDS, AND THE VOC CONTENT OF EACH MATERIAL, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS. ALL RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED ON THE PREMISES FOR AT LEAST FIVE YEARS AND SHALL BE MADE AVAILABLE TO ANY DISTRICT REPRESENTATIVE UPON REQUEST. [RULE 109, 1303(b)(2)-OFFSET]
- 8. THE MATERIALS USED IN THE CHROMATE, UV AND LACQUER COATERS SHALL HAVE A VOC CONTENT OF 5% BY WEIGHT OR LESS.
 [RULE 1303(a)(1)-BACT]
- 9. MATERIALS USED IN THE CHROMATE AND LACQUER COATERS SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1, EXCEPT HEXAVALENT CHROMIUM, WITH AN EFFECTIVE DATE OF MAY 2, 2003 OR EARLIER. [RULE 1401]
- 10. THE CLEANING MATERIAL USED IN THE CLEANING TANK SHALL NOT CONTAIN ANY VOC OR ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1, WITH AN EFFECTIVE DATE OF MARCH 7, 2008 OR EARLIER.
 [RULE 1303(b)(2)-OFFSET, 1401]

Periodic Monitoring:

11. THE OPERATOR SHALL CONDUCT AN INSPECTION FOR VISIBLE EMISSIONS FROM ALL STACKS AND OTHER EMISSION POINTS OF THIS EQUIPMENT WHENEVER THERE IS A PUBLIC COMPLAINT OF VISIBLE EMISSIONS, WHENEVER VISIBLE EMISSIONS ARE OBSERVED, AND ON AN ANNUAL BASIS, AT LEAST, UNLESS THE EQUIPMENT DID NOT OPERATE DURING THE ENTIRE ANNUAL PERIOD. THE ROUTINE ANNUAL INSPECTION SHALL BE CONDUCTED WHILE THE EQUIPMENT IS IN OPERATION AND DURING DAYLIGHT HOURS.

IF ANY VISIBLE EMISSIONS (NOT INCLUDING CONDENSED WATER VAPOR) ARE DETECTED THAT LAST MORE THAN THREE MINUTES IN ANY ONE-HOUR, THE OPERATOR SHALL VERIFY AND CERTIFY WITHIN 24 HOURS THAT THE EQUIPMENT CAUSING THE EMISSION AND ANY ASSOCIATED AIR POLLUTION CONTROL EQUIPMENT ARE OPERATING NORMALLY ACCORDING TO THEIR DESIGN AND STANDARD PROCEDURES AND UNDER THE SAME CONDITIONS UNDER WHICH COMPLIANCE WAS ACHIEVED IN THE PAST, AND EITHER:

- A. TAKE CORRECTIVE ACTION(S) THAT ELIMINATES THE VISIBLE EMISSIONS WITHIN 24 HOURS AND REPORT THE VISIBLE EMISSIONS AS A POTENTIAL DEVIATION IN ACCORDANCE WITH THE REPORTING REQUIREMENTS IN SECTION K OF THIS PERMIT; OR
- B. HAVE A CARB-CERTIFIED SMOKE READER DETERMINE COMPLIANCE WITH THE

Page 9

Engineering and Compliance

Appl. no. Below

Processed by Todd Iwata

Checked by Date 1.16.09

APPLICATION PROCESSING AND CALCULATION

OPACITY STANDARD, USING EPA METHOD 9 OR THE PROCEDURES IN THE CARB MANUAL "VISIBLE EMISSION EVALUATION", WITHIN THREE BUSINESS DAYS AND REPORT ANY DEVIATIONS TO AQMD.

THE OPERATOR SHALL KEEP THE RECORDS IN ACCORDANCE WITH THE RECORDKEEPING REQUIREMENTS IN SECTION K OF THIS PERMIT AND THE FOLLOWING RECORDS:

- A. STACK OR EMISSION POINT IDENTIFICATION:
- B. DESCRIPTION OF ANY CORRECTIVE ACTIONS TAKEN TO ABATE VISIBLE EMISSIONS;
- C. DATE AND TIME VISIBLE EMISSION WAS ABATED: AND
- D. VISIBLE EMISSION OBSERVATION RECORDED BY A CERTIFIED SMOKE READER. [RULE 3004 (a)(4)]

Emissions And Requirements:

12. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109

VOC: RULE 1107, SEE APPENDIX B FOR EMISSION LIMITS VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

CO: 2000 PPMV, RULE 407 PM: 0.1 GR/SCF, RULE 409

PM: RULE 405. SEE APPENDIX B FOR EMISSION LIMITS

A/N 470492:

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

 [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
 [RULE 204]
- 3. DUST COLLECTED IN THE BAGHOUSE SHALL BE DISCHARGED ONLY INTO CLOSED CONTAINERS.
 [RULE 1303(a)(1)-BACT]
- 4. THE OPERATOR SHALL INSTALL AND MAINTAIN A DIFFERENTIAL PRESSURE GAUGE TO ACCURATELY INDICATE THE DIFFERENTIAL PRESSURE ACROSS THE CARTRIDGE FILTERS.

[RULE 1303(a)(1)-BACT]

5. THE OPERATOR SHALL USE THIS EQUIPMENT IN SUCH A MANNER THAT THE DIFFERENTIAL PRESSURE BEING MONITORED DOES NOT EXCEED 5 INCHES OF WATER COLUMN.

[RULE 1303(a)(1)-BACT]

Periodic Monitoring:

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	Page 10
	Appl. no. Below
Engineering and Compliance	Processed by Todd Iwata
	Checked by
APPLICATION PROCESSING AND CALCULATION	Date 1.16.09

- 6. THE OPERATOR SHALL PERFORM AN ANNUAL INSPECTION OF THE EQUIPMENT AND FILTER MEDIA FOR LEAKS, BROKEN OR TORN FILTER MEDIA AND IMPROPERLY INSTALLED FILTER MEDIA. THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):
 - A. THE NAME OF THE PERSON PERFORMING THE INSPECTION AND/OR MAINTENANCE OF THE FILTER MEDIA;
 - B. THE DATE, TIME AND RESULTS OF THE INSPECTION; AND
 - C. THE DATE, TIME AND DESCRIPTION OF ANY MAINTENANCE OR REPAIRS RESULTING FROM THE INSPECTION.

[RULE 3004 (a)(4)]

7. THE OPERATOR SHALL DETERMINE AND RECORD THE PRESSURE DROP ACROSS THE BAGS ONCE EVERY WEEK.
[RULE 3004 (a)(4)]

Emissions And Requirements:

8. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULE AND REGULATION:

PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS

A/N 474334:

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

 [RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
 [RULE 204]
- 3. THE PICKLING TANK, INDUCTION COIL STATION, FURNACE AND DROSS AREA SHALL NOT BE OPERATED UNLESS IT IS VENTED ONLY TO AIR POLLUTION CONTROL EQUIPMENT WHICH IS IN FULL USE AND WHICH HAS BEEN ISSUED AN OPERATING PERMIT BY THE EXECUTIVE OFFICER.

 [RULE 1303(a)(1)-BACT]
- 4. THE TOTAL AMOUNT OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS FROM THE USE OF MATERIALS APPLIED IN THE CHROMATE, UV AND LACQUER COATERS PERMITTED UNDER APPLICATION NUMBERS 470481, 474334 AND 474335 SHALL NOT EXCEED 30 POUNDS IN ANY ONE DAY.
 [RULE 1303(b)(2)-OFFSET]

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Appl. no. Below

Engineering and Compliance

Processed by Todd Iwata

Checked by

APPLICATION PROCESSING AND CALCULATION

Date 1.16.09

5. IN ADDITION TO THE RECORDKEEPING REQUIREMENTS OF RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY DAILY VOC EMISSIONS, IN POUNDS, AND THE VOC CONTENT OF EACH MATERIAL, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS. ALL RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED ON THE PREMISES FOR AT LEAST FIVE YEARS AND SHALL BE MADE AVAILABLE TO ANY DISTRICT REPRESENTATIVE UPON REQUEST.

[RULE 109, 1303(b)(2)-OFFSET]

- 6. THE MATERIALS USED IN THE CHROMATE AND LACQUER COATERS SHALL HAVE A VOC CONTENT OF 5% BY WEIGHT OR LESS.
 [RULE 1303(a)(1)-BACT]
- 7. MATERIALS USED IN THE CHROMATE AND LACQUER COATERS SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1, EXCEPT HEXAVALENT CHROMIUM, WITH AN EFFECTIVE DATE OF MAY 2, 2003 OR EARLIER. [RULE 1401]

Periodic Monitoring:

8. THE OPERATOR SHALL CONDUCT AN INSPECTION FOR VISIBLE EMISSIONS FROM ALL STACKS AND OTHER EMISSION POINTS OF THIS EQUIPMENT WHENEVER THERE IS A PUBLIC COMPLAINT OF VISIBLE EMISSIONS, WHENEVER VISIBLE EMISSIONS ARE OBSERVED, AND ON AN ANNUAL BASIS, AT LEAST, UNLESS THE EQUIPMENT DID NOT OPERATE DURING THE ENTIRE ANNUAL PERIOD. THE ROUTINE ANNUAL INSPECTION

SHALL BE CONDUCTED WHILE THE EQUIPMENT IS IN OPERATION AND DURING DAYLIGHT HOURS.

IF ANY VISIBLE EMISSIONS (NOT INCLUDING CONDENSED WATER VAPOR) ARE DETECTED THAT LAST MORE THAN THREE MINUTES IN ANY ONE-HOUR, THE OPERATOR SHALL VERIFY AND CERTIFY WITHIN 24 HOURS THAT THE EQUIPMENT CAUSING THE EMISSION AND ANY ASSOCIATED AIR POLLUTION CONTROL EQUIPMENT ARE OPERATING NORMALLY ACCORDING TO THEIR DESIGN AND STANDARD PROCEDURES AND UNDER THE SAME CONDITIONS UNDER WHICH COMPLIANCE WAS ACHIEVED IN THE PAST, AND EITHER:

- A. TAKE CORRECTIVE ACTION(S) THAT ELIMINATES THE VISIBLE EMISSIONS WITHIN 24 HOURS AND REPORT THE VISIBLE EMISSIONS AS A POTENTIAL DEVIATION IN ACCORDANCE WITH THE REPORTING REQUIREMENTS IN SECTION K OF THIS PERMIT; OR
- B. HAVE A CARB-CERTIFIED SMOKE READER DETERMINE COMPLIANCE WITH THE OPACITY STANDARD, USING EPA METHOD 9 OR THE PROCEDURES IN THE CARB MANUAL "VISIBLE EMISSION EVALUATION", WITHIN THREE BUSINESS DAYS AND REPORT ANY DEVIATIONS TO AQMD.

THE OPERATOR SHALL KEEP THE RECORDS IN ACCORDANCE WITH THE RECORDKEEPING REQUIREMENTS IN SECTION K OF THIS PERMIT AND THE FOLLOWING RECORDS:

- A. STACK OR EMISSION POINT IDENTIFICATION;
- B. DESCRIPTION OF ANY CORRECTIVE ACTIONS TAKEN TO ABATE VISIBLE EMISSIONS;

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT Engineering and Compliance Engineering and Compliance Page 12 Appl. no. Below Processed by Todd Iwata Checked by APPLICATION PROCESSING AND CALCULATION Date 1.16.09

APPLICATION PROCESSING AND CALCULATION

C. DATE AND TIME VISIBLE EMISSION WAS ABATED; AND

D. VISIBLE EMISSION OBSERVATION RECORDED BY A CERTIFIED SMOKE READER.

[RULE 3004 (a)(4)]

Emissions And Requirements:

9. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULE AND REGULATION:

VOC: RULE 109

VOC: RULE 1107, SEE APPENDIX B FOR EMISSION LIMITS VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS PM: RULE 405, SEE APPENDIX B FOR EMISSION LIMITS

A/N 474335:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.

[RULE 204]

2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]

- 3. THE PICKLING TANK, FURNACE AND DROSS AREA SHALL NOT BE OPERATED UNLESS IT IS VENTED ONLY TO AIR POLLUTION CONTROL EQUIPMENT WHICH IS IN FULL USE AND WHICH HAS BEEN ISSUED AN OPERATING PERMIT BY THE EXECUTIVE OFFICER.

 [RULE 1303(a)(1)-BACT]
- 4. THE TOTAL QUANTITY OF NATURAL GAS USED IN THIS EQUIPMENT AND THE EQUIPMENT OPERATING UNDER APPLICATION NUMBER 470481 SHALL NOT CUMULATIVELY EXCEED 3,600,000 CUBIC FEET IN ANY ONE MONTH.
 [RULE 1303(b)(2)-OFFSET]
- 5. THE OPERATOR SHALL INSTALL AND MAINTAIN A NON-RESETTABLE TOTALIZING FUEL METER TO ACCURATELY INDICATE THE AMOUNT OF FUEL BEING SUPPLIED TO THE EQUIPMENT OPERATING UNDER APPLICATION NUMBERS 470481 AND 474335. [RULE 1303(b)(2)-OFFSET]
- 6. THE TOTAL AMOUNT OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS FROM THE USE OF MATERIALS APPLIED IN THE CHROMATE, UV AND LACQUER COATERS PERMITTED UNDER APPLICATION NUMBERS 470481, 474334 AND 474335 SHALL NOT EXCEED 30 POUNDS IN ANY ONE DAY.

 [RULE 1303(b)(2)-OFFSET]

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	Page 13
_	Appl. no. Below
Engineering and Compliance	Processed by Todd Iwata
	Checked by
APPLICATION PROCESSING AND CALCULATION	Date 1.16.09

7. IN ADDITION TO THE RECORDKEEPING REQUIREMENTS OF RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY DAILY VOC EMISSIONS, IN POUNDS, AND THE VOC CONTENT OF EACH MATERIAL, AS APPLIED, INCLUDING WATER AND EXEMPT COMPOUNDS. ALL RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED ON THE PREMISES FOR AT LEAST FIVE YEARS AND SHALL BE MADE AVAILABLE TO ANY DISTRICT REPRESENTATIVE UPON REQUEST.

[RULE 109, 1303(b)(2)-OFFSET]

- 8. THE MATERIALS USED IN THE CHROMATE AND LACQUER COATERS SHALL HAVE A VOC CONTENT OF 5% BY WEIGHT OR LESS.
 [RULE 1303(a)(1)-BACT]
- 9. MATERIALS USED IN THE CHROMATE AND LACQUER COATERS SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1, EXCEPT HEXAVALENT CHROMIUM, WITH AN EFFECTIVE DATE OF MAY 2, 2003 OR EARLIER. [RULE 1401]

Periodic Monitoring:

10. THE OPERATOR SHALL CONDUCT AN INSPECTION FOR VISIBLE EMISSIONS FROM ALL STACKS AND OTHER EMISSION POINTS OF THIS EQUIPMENT WHENEVER THERE IS A PUBLIC COMPLAINT OF VISIBLE EMISSIONS, WHENEVER VISIBLE EMISSIONS ARE OBSERVED, AND ON AN ANNUAL BASIS, AT LEAST, UNLESS THE EQUIPMENT DID NOT OPERATE DURING THE ENTIRE ANNUAL PERIOD. THE ROUTINE ANNUAL INSPECTION SHALL BE CONDUCTED WHILE THE EQUIPMENT IS IN OPERATION AND DURING DAYLIGHT HOURS.

IF ANY VISIBLE EMISSIONS (NOT INCLUDING CONDENSED WATER VAPOR) ARE DETECTED THAT LAST MORE THAN THREE MINUTES IN ANY ONE-HOUR, THE OPERATOR SHALL VERIFY AND CERTIFY WITHIN 24 HOURS THAT THE EQUIPMENT CAUSING THE

EMISSION AND ANY ASSOCIATED AIR POLLUTION CONTROL EQUIPMENT ARE OPERATING NORMALLY ACCORDING TO THEIR DESIGN AND STANDARD PROCEDURES AND UNDER THE SAME CONDITIONS UNDER WHICH COMPLIANCE WAS ACHIEVED IN THE PAST, AND EITHER:

- A. TAKE CORRECTIVE ACTION(S) THAT ELIMINATES THE VISIBLE EMISSIONS WITHIN 24 HOURS AND REPORT THE VISIBLE EMISSIONS AS A POTENTIAL DEVIATION IN ACCORDANCE WITH THE REPORTING REQUIREMENTS IN SECTION K OF THIS PERMIT; OR
- B. HAVE A CARB-CERTIFIED SMOKE READER DETERMINE COMPLIANCE WITH THE OPACITY STANDARD, USING EPA METHOD 9 OR THE PROCEDURES IN THE CARB MANUAL "VISIBLE EMISSION EVALUATION", WITHIN THREE BUSINESS DAYS AND REPORT ANY DEVIATIONS TO AQMD.

THE OPERATOR SHALL KEEP THE RECORDS IN ACCORDANCE WITH THE RECORDKEEPING REQUIREMENTS IN SECTION K OF THIS PERMIT AND THE FOLLOWING RECORDS:

- A. STACK OR EMISSION POINT IDENTIFICATION;
- B. DESCRIPTION OF ANY CORRECTIVE ACTIONS TAKEN TO ABATE VISIBLE EMISSIONS;

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT Appl. no. Below Engineering and Compliance Processed by Todd Iwata Checked by APPLICATION PROCESSING AND CALCULATION Date 1.16.09

- C. DATE AND TIME VISIBLE EMISSION WAS ABATED; AND
- D. VISIBLE EMISSION OBSERVATION RECORDED BY A CERTIFIED SMOKE READER. [RULE 3004 (a)(4)]

Emissions And Requirements:

11. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109

VOC: RULE 1107, SEE APPENDIX B FOR EMISSION LIMITS VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

CO: 2000 PPMV, RULE 407 PM: 0.1 GR/SCF, RULE 409

PM: RULE 405, SEE APPENDIX B FOR EMISSION LIMITS

wtc - 14th rev misc changes